

EXHIBIT A

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
'072: 10	"determining, by the document platform"	determining, by the document repository	'072 FH: October 15, 2008 Amendment '072: Fig 2, 7:56-63; 8:22-25; 12:57-65; 26:25-38 '072: Claim 10	American Heritage College Dictionary, Fourth Edition, at 415 Microsoft Computing Dictionary, Fifth Edition, at 171 The Tech Terms Computer Dictionary, available at http://www.techterms.com/ Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'072: 1, 8, 10, 16	"digital document" "document"	Any work that has been reduced to a digital representation	'072: Fig 2, 7:56-63; 8:22-25; 10:51-55; 12:57-65; 26:25-38; 41:36-58; Claims 3, 11 See also intrinsic evidence cited for "digital content" and "content"	American Heritage College Dictionary, Fourth Edition, at 415 Microsoft Computing Dictionary, Fifth Edition, at 171 The Tech Terms Computer Dictionary, available at http://www.techterms.com/ Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'072: 1, 10	"document platform"	a repository for rendering a digital document	'072: Fig 2, 7:56-63; 8:22-25; 12:57-65; 26:25-38 '072 FH: October 15, 2008	American Heritage College Dictionary, Fourth Edition, at 415

¹ U.S. Patent Nos. 6,963,859 ("859"), 7,523,072 ("072"), 7,225,160 ("160"), 7,269,576 ("576"), 8,370,956 ("956"), and No. 8,393,007 ("007").

² ContentGuard reserves the right to rely on any evidence identified by Defendants.

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT²	EXTRINSIC SUPPORT
			Amendment IPR2013-00133 ('072 IPR), Doc. 15: p. 16-17	Microsoft Computing Dictionary, Fifth Edition, at 171 The Tech Terms Computer Dictionary, available at http://www.techterms.com/ Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'007: 1, 3, 4, 6, 8, 9, 11, 13 '160: 1, 9, 10 '576: 1, 4, 7, 18, 21, 24, 34 '859: 1, 58 '956: 1, 4, 5, 7, 10, 11, 13, 16, 17	"content" "digital content"	Any work that has been reduced to a digital representation	'859: Fig. 1; Figs. 5-10; Fig. 12; 1:30-48; 5:46-6:7; 6:33-38; 8:33- 11:2; 12:1-2; 13:16-47; 35:28-29; 36:1-3; 36:12-14; 49:52-54 Application No. 08/967,084: Dec. 15, 1999 Amendment. '072 FH: May 23, 2008 Amendment; July 22, 2008 Office Action; October 15, 2008 Amendment	Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'160: 1, 2, 3, 6, 9, 10 ³	"digital work"	Any work that has been reduced to a digital representation	'160 Claims 1, 12 '160 at 5:20-21, 5:25-26, 7:55-8:65, 47:16-18, 47:32-39	

³ The term "digital work" is only recited in these asserted claims of the '160 patent. ContentGuard objects to Defendants' attempt to import the construction of the term "digital work" into the other Stefik patents where the term does not appear in any of the asserted claims.

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT²	EXTRINSIC SUPPORT
'859: 1, 58	"distributed repository"	A repository adapted for use in a distributed system	<p>'859: 2:29-39; 25:48-61 '859 FH: March 8, 2005 Amendment</p> <p>IPR2013-00137 ('859): Doc. 58: p. 22-23</p> <p>'859: Figures 1-4b; 12, 16-19; Col. 6:17-21; 6:33-8:31; 11:51-12:59; 13:10-14:2; 25:37-26:1; 28:57-29:35; 35:64-36:17; 36:37-60; 39:27-33; 41:27-42:44; 50:48-52</p> <p>IPR2013-00137 ('859): Doc. 16: p. 15-20; Doc. 17: p. 9-15; Doc. 34; Doc. 58: p. 7-20, 26; Exhibit-2013</p>	<p>Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79</p> <p>McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, at 596</p>
'956: 5, 11, 17	"identification certificate"	A signed digital message that attests to the identity of the possessor	'956 at 26:46-27:27; 49:55-58	
'859: 1, 19, 20, 58, 75, 76 '072: 1, 10 '160: 1, 3	"manner of use"	A way in which [a digital work / digital content / content / a digital document] may be used	'859: Figs. 14, 15; 17:23-25:36	
'956: 6, 12, 18	"nonce"	Random or variable information for determining whether a system can correctly perform a cryptographic	'956: Fig. 16; 26:23-29; 27:34-64; claims 6, 12, 18.	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
'007: 5, 10, 15		operation	IPR2013-00137 ('859): Doc. 58: p. 10-11	
'956: 5, 11, 17 '007: 4, 9, 14	"random registration identifier"	Random or variable information for identifying a communication session	'956 at 26:46-27:27	
'160: 1	"grammar"	A manner of defining a valid sequence of symbols for a language	160 Claim 1 160 at 16:62-63	The Google.com Dictionary American Heritage College Dictionary, Fourth Edition, at 602 American Heritage Dictionary of the English Language, Fourth Edition
'160: 1	"description structure"	A structure which describes the location of content and the usage rights for a digital work that is comprised of description blocks, each of which corresponds to a digital work or to an interest in a digital work.	160 at 47:31-36	
'160: 2	"status information"	No construction necessary/Ordinary and customary meaning	160 at 9:3-37, Fig. 10	Microsoft Computing Dictionary, Fifth Edition, at 498
'576: 1	"means for authorizing the repository for making the digital content available for rendering"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 31:6-9, 36:45-46, 37:18-19, 41:31-42:16, and equivalents thereof; see also, e.g.,	'576: 31:6-9, 36:45-46, 37:18-19, 41:31-42:16 Decision of the Patent Trial and Appeal Board instituting review of the '576 Patent ("576 PTAB Decision") at 24-25	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
		Decision of the Patent Trial and Appeal Board instituting review of the '576 Patent ("'576 PTAB Decision") at 24-25		
'576: 1	"means for checking whether the request is for a permitted rendering of the digital content in accordance with rights specified in the apparatus"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 30:59-31:49, 31:3-49, 36:45-46, 37:18-19, and equivalents thereof; see also, e.g., '576 PTAB Decision at 22-23	'576 Spec. at 30:59-31:49, 31:3-49, 36:45-46, 37:18-19 '576 PTAB Decision at 22-23	
'859: 24	"means for communicating with a master repository for obtaining an identification certificate for the repository"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '859 Spec., including from the following portions: 7:16-17; 13:52-59, Fig. 2, Fig. 12, and equivalents thereof	'859 Spec. at 7:16-17; 13:52-59; Figs. 2 and 12 IPR2013-00137 ('859): Doc. 17: p. 16	
'576: 1	"means for making a request for an authorization object required to be included within the repository for the apparatus to render the digital content"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 31:6-9, 41:31-42:16, and equivalents thereof; see also, e.g., '576 PTAB Decision at 25	'576 Spec. at 31:6-9, 41:31-42:16 '576 PTAB Decision at 25	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
'576: 1	"means for processing a request from the means for requesting"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 30:25-30, 30:59-31:49, 32:20-31, 36:35-54, 37:9-26, and equivalents thereof; see also, e.g., '576 PTAB Decision at 21-22	'576 Spec. at 30:25-30, 30:59-31:49, 32:20-31, 36:35-54, 37:9-26 '576 PTAB Decision at 21-22	
'576: 1	"means for processing the request to make the digital content available to the rendering engine for rendering when the request is for a permitted rendering of the digital"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 36:46-49, 37:20-22, 33:3-49; see also, e.g., '576 PTAB Decision at 23-24	'576 Spec. at 36:46-49, 37:20-22, 33:3-49; '576 PTAB Decision at 23-24	
'576: 1	"means for receiving the authorization object when it is determined that the request should be granted"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 32:33, 33:9-49, 36:47-50, 41:50-65, and equivalents thereof; see also, e.g., '576 PTAB Decision at 26	'576 Spec. at 32:33, 33:9-49, 36:47-50, 41:50-65 '576 PTAB Decision at 26	
'576: 4	"means for requesting a transfer of the digital content from an external	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 30:25-30,	'576 Spec. at 30:25-30, 30:59-31:49, 32:20-31, 36:35-54, 37:9-26 '576 PTAB Decision at 20-22	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
	memory to the storage"	30:59-31:49, 32:20-31, 36:35-54, 37:9-26, and equivalents thereof; see also, e.g., '576 PTAB Decision at 20-22		
'576: 1	"means for requesting use of the digital content stored in the storage"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '576 Spec., including from the following portions: 16:20-45, and equivalents thereof	'576 Spec. at 16:20-45	
'859: 1, 13, 19, 20, 21, 24, 58, 69, 71 '072: 1, 10 '576: 1, 18 '956: 1, 7, 13 '007: 1, 3, 6, 8, 11, 13 '160: 1	"render" "rendering"	Converting into an ephemeral, transitory, or nondigital form, such as for playing digital movies, playing digital music, playing a video game, running a computer program, or displaying a document on a display	'859 Spec. at 18:44-55; 35:27-36:36; 50:42-46	
'859: 1, 15, 21, 24, 58, 71, 81 '072: 1, 10 '576: 1, 18	"repository"	a trusted system in that it maintains physical, communications, and behavioral integrity in the support of usage rights "physical integrity" —prevents access to content by a non-trusted system "communications integrity" —only communicates with other devices that are able to present proof that they are trusted systems, for example, by using	'859: Figures 1-4b; 12, 16-19; Col. 6:17-21; 6:33-8:31; 11:51-12:59; 13:10-14:2; 25:37-26:1; 28:57-29:35; 35:64-36:17; 36:37-60; 39:27-33; 41:27-42:44; 50:48-52 IPR2013-00137 ('859): Doc. 16: p. 15-20; Doc. 17: p. 9-15; Doc. 34; Doc. 58: p. 7-20, 26; Exhibit-2013	Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
		security measures such as encryption, exchange of digital certificates, and nonces “behavioral integrity”— requires software that is to be installed in the repository to include a digital certificate, in other words, an assurance that the software comes from a source known to the repository		
'859: 1, 58 '072: 1, 8, 10, 16 '576: 1, 15, 18, 32 '956: 1, 7, 13 '007: 1, 6, 11 '160: 1	“rights” “usage rights” “usage rights information”	An indication of the manner in which a [digital work / digital content / content / a digital document] may be used or distributed as well as any conditions on which use or distribution is premised	'859: Figs. 1, 5-10, 12, 14, 15; Abstract; 1:10-12; 5:64-6:16; 6:33-61; 7:18-26; 8:33-11:50; 12:16-20; 13:16-50; 15:45-48; 16:4-7; 16:63-25:47; 29:49-31:30; 33:35-49:26; 51:7-10	Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'956: 1, 7, 13 '007: 1, 6, 11	“trusted”	maintains physical, communications, and behavioral integrity in the support of usage rights “physical integrity” —prevents access to content by a non-trusted system “communications integrity” —only communicates with other devices that are able to present proof that they are	[Same as repository]	Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
		trusted systems, for example, by using security measures such as encryption, exchange of digital certificates, and nonces "behavioral integrity"— requires software that is to be installed in the repository to include a digital certificate, in other words, an assurance that the software comes from a source known to the repository		
'576: 1, 18 '956: 4, 10, 16 '007: 3, 8, 13	"authorization object"	digital information that must be possessed to gain access to digital content	'859: 7:18-26; 21:57-22:9; 40:42-41:26	
'859: 1, 58	"requester mode of operation"	No construction necessary / Plain Meaning	'859: Claims 1, 29, 58; Figs. 2, 19; 7:5-10; 29:36-48; 32:1-5; 50:52-54; '859 FH: 3/08/05 Response to Office Action	Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'859: 1, 58	"server mode of operation"	No construction necessary / Plain Meaning	'859: Claims 1, 29, 58; Figs. 2, 19; 7:5-10; 29:36-48; 32:1-5; 50:60-62; '859 FH: 3/08/05 Response to Office Action	Petition to the United States Patent and Trademark Office for Covered Business Method Patent Review of U.S. Patent No. 8,118,221, at 36-79
'007: 5	"validating" (claim 5 of the	The phrase "The method of claim 1, wherein the validating comprises:"	'007: Claims 4, 5, 9, 10, 14, 15	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '859, '072, '160, '576, '956, '007 ¹				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT ²	EXTRINSIC SUPPORT
	'007)	should be corrected to read: "The method of claim 4, wherein the validating comprises:"		

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '280, '053 ⁴				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
'280: 11, 22 '053: 1, 3, 4, 5, 15, 23	"license"	data embodying a grant of usage rights and/or meta-rights	280 Claims 11, 22; 280 Figs. 3, 4; 280 at 4:7-8, 5:13-14, 7:41-42, 9:48-53; 053 Claims 1, 3, 4, 5, 15, 23; 053 Fig. 10; 053 at 4:60-61, 10:15-16, 14:65-15:20, 16:1-8, 20:18-24, 20:32-35	
'280: 1, 11, 12, 22	"meta-right"	a right that when exercised creates or disposes of usage rights or other meta-rights but is not itself a usage right	280 Claims 1, 3, 4, 5, 6, 10, 11, 12, 22; 280 Abstract; 280 Figs. 5, 7, 8, 9-12, 14-16; 280 at 4:36-38, 5:47-49, 7:23-31; 280 FH: September 23, 2010 Request for Rehearing (and Exhibits thereto) before the Board of Patent Appeals and Interferences; 053 Claims 1, 3, 4, 15; 053 Abstract; 053 Figs. 6, 8, 14, 15, 16, 18-20; 053 at 3:4-5, 5:20-23, 5:25-27, 15:45-46; 053 FH: July 17, 2006 Response to Office Action; October 31, 2007 Response to Office Action; December 31, 2008 Reply Brief before the Board of Patent Appeals and Interferences; September 14, 2010 Supplemental Appeal Brief (and Exhibits thereto) before the Board of Patent Appeals and Interferences; November 22, 2010 Response to Office Action	December 16, 2009 Decision of the Board of Patent Appeals and Interferences in Appeal No. 2009-008480

⁴ U.S. Patent Nos. 7,774,280 ("280") and 8,001,053 ("053")

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '280, '053 ⁴				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
'053: 1, 3, 4, 5, 15, 23	"usage rights"	Same as in Stefik Patents, i.e., "an indication of the manner in which a [digital work / digital content / content / a digital document] may be used or distributed as well as any conditions on which use or distribution is premised"	053 at 2:37-45, 6:23-25. January 10, 2008 Response to Office Action in Application No. 10/162,701 859 at Figs. 1, 5-10, 12, 14, 15; Abstract; 1:10-12; 5:64-6:16; 6:33-61; 7:18-26; 8:33-11:50; 12:16-20; 13:16-50; 15:45-48; 16:4-7; 16:63-25:47; 29:49-31:30; 33:35-49:26; 51:7-10	280 at 4:36-38, 5:22-24, 5:42-47.
'053: 1, 15	"manner of use"	Same as in Stefik Patents, i.e., "A way in which [a digital work / digital content / content / a digital document] may be used"	053 at 2:37-45. 859 at Figs. 14, 15; 17:23-25:36	
'280: 1, 12 '053: 1, 15	"repository"	Same as in Stefik Patents, i.e.: a trusted system in that it maintains physical, communications, and behavioral integrity in the support of usage rights "physical integrity" —prevents access to content by a non-trusted system "communications integrity" —only communicates with other devices that are able to present proof that they are trusted systems, for example, by using security measures such as encryption, exchange of digital certificates, and nonces "behavioral integrity"— requires software that is to be installed in the repository to include a digital	859 at Figures 1-4b; 12, 16-19; Col. 6:17-21; 6:33-8:31; 11:51-12:59; 13:10-14:2; 25:37-26:1; 28:57-29:35; 35:64-36:17; 36:37-60; 39:27-33; 41:27-42:44; 50:48-52 IPR2013-00137 ('859): Doc. 16: p. 15-20; Doc. 17: p. 9-15; Doc. 34; Doc. 58: p. 7-20, 26; Exhibit-2013	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '280, '053 ⁴				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
		certificate, in other words, an assurance that the software comes from a source known to the repository		
'280: 1, 5, 11, 12, 22 '053: 1, 3, 4, 5, 15, 23	"right(s)"	The term "right" in the claims of the 280 and 053 patents can mean "meta-right" or "usage right," depending on the context in which the term appears in the claims.	[Agreed term]	
'280: 1, 5, 12 '053: 1, 4, 5, 15, 23	"state variable"	A variable having a value, or identifying a location at which a value is stored, that represents status of an item, rights, license, or other potentially dynamic conditions	280 Claims 1, 2, 3, 4, 5, 6, 7, 8, 9; 280 at 7:65, 8:14 ; 053 Claims 1, 2, 3, 4, 5, 6, 15, 23; 053 at 5:42, 15:29-34, 16:59-17:15, 17:59-63, 17:64-18:7, 18:8-50, 18:60- 66, 19:9-13, 19:29-39, 19:61-20:6; 053 FH: February 28, 2007 Response to Office Action; October 31, 2007 Response to Office Action; December 31, 2008 Reply Brief before the Board of Patent Appeals and Interferences	Microsoft Computing Dictionary, Fifth Edition, at 498, 547
'280: 1, 5, 12 '053: 1, 4, 5, 15, 23	"specifying, in a first license . . . at least one usage right and at least one meta-right for the item, wherein the usage right and the metaright include at least one right that is shared among one or more users or	specifying in a first license, at least one usage right and at least one meta-right for the item, wherein at least one of the meta-right or the usage right is shared among one or more users or devices	053 Claims 1, 15; 053 Abstract; 053 Figs. 15, 16, 18 053 at 13:10-55, 17:57-63, 18:7-31, 18:32-50; 053 FH: October 31, 2007 Response to Office Action; December 31, 2008 Reply Brief before the Board of Patent Appeals and Interferences	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '280, '053 ⁴				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
	devices"			
'053: 1, 15	"the at least one state variable identifies a location where a state of rights is tracked"	Ordinary and customary meaning.	053 Claims 1, 3, 4, 5, 15, 23 053 at 16:59-17:3, 16:21-36, 18:14-50, 19:14-46, 19:61-20:6, 20:29-37; 053 FH: February 28, 2007 Amendment; October 31, 2007 Amendment; December 31, 2008 Reply Brief before the Board of Patent Appeals and Interferences	
'280: 12	"means for obtaining a set of rights associated with an item, the set of rights including a meta-right specifying a right that can be created when the meta-right is exercised, wherein the meta-right is provided in digital form and is enforceable by a repository"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '280 Spec., including from the following portions: Figs. 1, 5, 8 and 4:66-5:16, 5:18-21, 6:10-17, 8:31-35, 9:54-58, 10:37-45, and equivalents thereof	280 at Figs. 1, 5, 8 and 4:66-5:16, 5:18-21, 6:10-17, 8:31-35, 9:54-58, 10:37-45 '859: Figs. 1, 5-10, 12, 14, 15; Abstract; 1:10-12; 5:64-6:16; 6:33-61; 7:18-26; 8:33-11:50; 12:16-20; 13:16-50; 15:45-48; 16:4-7; 16:63-25:47; 29:49-31:30; 33:35-49:26; 51:7-10	
'280: 12	"means for determining whether the rights consumer is entitled to the right specified by the meta-right"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '280 Spec., including from the following portions: Figs. 5, 7, 8 and 8:66-9:8, 9:66-10:2, 10:35-45, and equivalents thereof	280 at Figs. 5, 7, 8 and 8:66-9:8, 9:66-10:2, 10:35-45	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NOS. '280, '053⁴				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
'280: 12	"means for exercising the meta-right to create the right specified by the meta-right, if the rights consumer is entitled to the right specified by the meta-right"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '280 Spec., including from the following portions: Figs. 5, 7, 8 and 8:56-57, 9:9-22, 9:33-66, 10:2-7, 10:35-45, 10:62-66, and equivalents thereof	280 at Figs. 5, 7, 8 and 8:56-57, 9:9-22, 9:33-66, 10:2-7, 10:35-45, 10:62-66	
'280: 22	"means for generating a license including the created right, , if the rights consumer is entitled to the right specified by the meta-right"	Corresponding Structure: algorithm/structure necessary for performing the recited function set forth in the '280 Spec., including from the following portions: Figs. 1, 3, 4, 5, 7, 8 and 4:2-49, 5:6-13, 8:31-35, 8:56-57, 9:9-22, 9:33-66, 10:2-7, 10:35-45, 10:62-66, and equivalents thereof	280 at Figs. 1, 3, 4, 5, 7, 8 and 4:2-49, 5:6-13, 8:31-35, 8:56-57, 9:9-22, 9:33-66, 10:2-7, 10:35-45, 10:62-66	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NO. 8,583,556 ("556")				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD'S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
'556: 1, 12	"instance"	instantiation	556 at 2:32-34, 3:27-28, 3:43-46, 4:24-38, 5:37-44, 6:53-62, 8:23-27, 14:26-31 556 FH: April 6, 2012 Office Action	
'556:1, 12	"other portion"	an unused part of the digital asset or information prepended or postpended to the digital asset	556 at 6:1-3, 19:36-38	
'556:8	"the method of claim 1, wherein distributions of said digital asset over said network between user devices are not preconditioned on securing authorization for individual copies of said digital asset"	the method of claim 1, wherein distributions of said digital asset [[over said network]] between user devices are not preconditioned on securing authorization for individual copies of said digital asset clerical error -- "over said network" should be deleted	556 Claims 1, 8, 12, 19 556 FH: August 14, 2013 Response to Office Action	
'556:19	"the system of claim 12, wherein distributions of said digital asset over said network between user devices are not preconditioned on securing authorization for individual copies of said digital asset"	the system of claim 12, wherein distributions of said digital asset [[over said network]] between user devices are not preconditioned on securing authorization for individual copies of said digital asset clerical error -- "over said network" should be deleted	556 Claims 1, 8, 12, 19 556 FH: August 14, 2013 Response to Office Action	

Plaintiff ContentGuard Holdings Inc.'s P.R. 4-3 Disclosures

P.R. 4-3 DISCLOSURES FOR U.S. PATENT NO. 8,583,556 (“’556”)				
PATENT/ CLAIMS	CLAIM TERM	CONTENTGUARD’S PROPOSED CONSTRUCTION	INTRINSIC SUPPORT	EXTRINSIC SUPPORT
	asset”			
’556:1, 2	“detect(ing) a transfer”	to discover or determine the existence, presence, or fact of a transfer	556 Claims 1 and 2; 556 at 15:30-44.	Merriam-Webster Dictionary, at http://www.merriam-webster.com/dictionary/detect